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*The Firm that Fights for Workers' Rights!*

July 18, 2019

**Via ECF**

Hon. Deborah A. Batts  
United States District Court Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: Request to withdraw complaint without prejudice**  
**CASE NAME: SHEEHAN V. CONSENSYS, INC.**  
**Case No. 19-cv-06687 (DAB)**

Dear Judge Batts,

I represent the Plaintiff in the above referenced matter. I am writing the Court to request permission to withdraw the complaint without prejudice. Our office inadvertently filed this matter in the Southern District when the proper venue is the Eastern District as the Defendant is located in Brooklyn.

Additionally, Plaintiff seeks a refund of the \$400 filing fee paid to initiate the case in the S.D.N.Y. If your Honor would be so kind as to grant this request as well, I would greatly appreciate it.

Thank you for your time and attention to this matter, and I apologize for the inconvenience.

Respectfully Submitted,

By: \_\_\_\_\_

Jordan El-Hag, Esq.